

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

CHIARRHA WILLIAMS

Plaintiff,

v.

UNITED RECOVERY AND
MARKETING, LLC

Serve: Corporation Service Co., Registered Agent
2908 Poston Avenue
Nashville, Tennessee 37203-1312

and

S&S TOWING AND RECOVERY, LLC

Serve: Samuel David Justice, Registered Agent
7911 Appomattox Avenue
Manassas, Virginia 20111

Defendants.

Case No 1:21-cv-00457

MOTION TO ALLOW AMENDMENT OF COMPLAINT
SO AS TO CORRECT CLERICAL ERROR

COMES NOW your Plaintiff, by counsel, and respectfully requests leave of court to file and serve the Amended Complaint attached hereto as Exhibit 1 so as to correct a clerical error in the original Complaint. The original Complaint mistakenly listed the defendant as United Recovery and Marketing, LLC. The correct name for the defendant is United Recovery and Remarketing, LLC. No Defendant has entered an appearance as of yet, and Plaintiff will serve both Defendants with the Amended Complaint forthwith. A proposed order is attached hereto as Exhibit 2.

Date: July 8, 2021

Respectfully Submitted,
CHIARRHA WILLIAMS

By: /s/ Thomas R. Breeden
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